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Attorneys for Defendant County of Los Angeles, a public entity

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CARLA WADE, and N.A., a minor, by and through his guardian ad litem, SUMMER NELSON, Individually and as Successors in Interest of NEPHI ARREGUIN, Decedent, Plaintiffs, vs. COUNTY OF LOS ANGELES, and DOES 1 through 50, inclusive, individually and in their official capacities, Defendants.	Case No.: **NOTICE OF REMOVAL OF ACTION** **[28 U.S.C. §§ 1441 (Federal Question)]**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendant County of Los Angeles, a public entity, hereby removes to the United States District Court – Central District of California the state court action described below.

1. On or about February 22, 2016, an action was commenced in the County of Los Angeles Superior Court, Central District, entitled Carla Wade, et al. v. County of Los Angeles, et al., bearing case number BC611073. Attached hereto as Exhibit "A" is a copy of the original Complaint that was filed in this action.

2. Defendant County of Los Angeles was served with this action on April 6, 2016.

3. This action is a civil action of which the United States District Court – Central District of California has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to federal court by the defendant pursuant to the provisions of 28 U.S.C. § 1441(b) and (c), in that it involves claims for violations of 42 U.S.C. § 1983.

4. All named defendants who have been served with the Summons and Complaint in this action join in this Notice of Removal.

DATED: May 6, 2016

CARPENTER, ROTHANS & DUMONT

By: ______________________________
MARK D. RUTTER
DANIELLE C. FOSTER
Attorneys for Defendant County of Los Angeles, a public entity

CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen and not a party to the within entitled action. My business address is 888 S. Figueroa Street, Suite 1960, Los Angeles, California 90017.

On May 6, 2016, I served the foregoing document(s) described as:

NOTICE OF REMOVAL OF ACTION

on the interested parties in this action ☒ by placing: ☐ the original ☒ a true copy thereof enclosed in sealed envelope(s) addressed as follows:

Milton C. Grimes, Esq.
Iverson Matthew Jackson, Esq.
Law Offices of Milton C. Grimes, APC
3774 West 54th Street
Los Angeles, CA 90043
Phone: 323-295-3023
Fax: 323-295-3708
Email: miltgrim@aol.com
Mattj57@hotmail.com
Attorneys for Plaintiffs

☒ (BY MAIL) I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

☐ (BY FACSIMILE TRANSMISSION) I caused a true and complete copy of the documents described above to be transmitted by facsimile transmission to the telephone number(s) set forth opposite the name(s) of the person(s) set forth below.

☒ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on May 6, 2016, at Los Angeles, California.

Lynn Gandi